

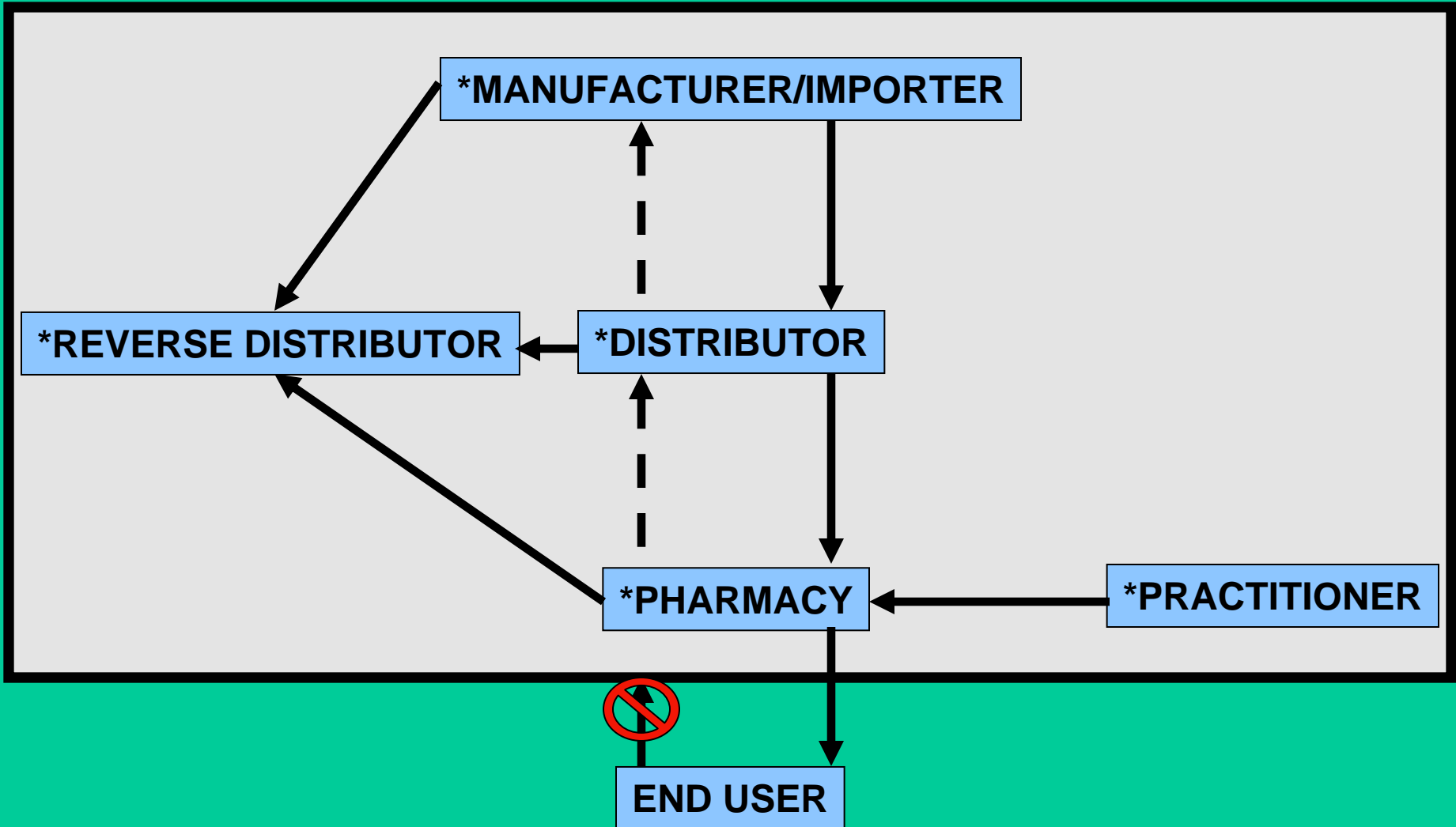
DEA Requirements for Disposal of Controlled Substances

Group Supervisor Abby Foster Hayes
Drug Enforcement Administration
Detroit Division Office
313-234-4006
Abby.F.Hayes@usdoj.gov

Closed System of Distribution

- All handlers (“registrants”) of controlled substances (except the end user) must maintain a DEA registration
- Each registrant involved in a transaction must verify the other registrant’s DEA registration (until dispensed to end user)
- Any transfer by the end user to any other person is illegal distribution

CLOSED SYSTEM



*DEA Registrant

Disposition of Unwanted Controlled Substances

- For Registrants:
 - Return to supplier
 - Send to “Reverse Distributor”
 - Receive permission from DEA to destroy on-site

Returns To Supplier

- Document to show transfer
- Schedule II drugs must be transferred on DEA Form 222

Use of “Reverse Distributors”

- “Reverse distributors” are firms registered by DEA to acquire and dispose of out-dated and/or damaged controlled substances
 - Most if not all also handle non-controlled substances
- Transfers to “reverse distributors” are documented like transfers to any other DEA registrant
- Each “reverse distributor” has own system of inventorying, collecting, documenting
- “Reverse distributors” provide a service (translation: they cost money)

Permission from DEA to Destroy CS on Site

- Practitioners (doctors, pharmacies) can request permission once a year
 - Submit written request in advance to local DEA office
 - Name, address, DEA number
 - Proposed date of destruction
 - Who destroying and witnessing (need at least 2 people)
 - Method of destruction (must be “beyond reclamation”)
 - Copy of DEA Form 41 listing drugs to be destroyed
 - DEA will approve in writing
 - After destruction, send copy of DEA 41 to DEA
 - Retain DEA 41 for two years

Permission from DEA to Destroy CS on Site

- Manufacturers, Distributors, Hospitals can be granted “blanket approval” for regular, periodic destruction
 - Submit written request/protocol to local DEA office
 - Name, address, DEA number
 - Proposed schedule of destruction
 - Who destroying and witnessing (need at least 2 people)
 - Method of destruction (must be “beyond reclamation”)
 - DEA will approve in writing
 - After destructions, send copy of DEA 41 to DEA
 - Retain DEA 41 for two years

Nursing Homes

- NOT DEA registrants
- In Michigan, NHs have been granted “blanket” drug destruction approval by DEA Detroit
 - Must request approval by submitting written protocol
 - Permission will be granted in writing
 - Approved protocol must be followed
 - Must document destruction on DEA Form 41 or other approved form (submitted with protocol)
 - Must be witnessed by at least 2 people
 - Must maintain documents for 2 years
 - CS must be destroyed “beyond reclamation”

Community Collection Programs

- Pharmacies, “Reverse Distributors,” and other registrants can NOT accept controlled substances (CS) at community collection programs
- To accept CS, community programs MUST have law enforcement participation
 - Law enforcement is exempt from registration requirements (can accept CS without being in the “closed system”)
 - The law enforcement agency must destroy the collected CS in accordance with agency evidence destruction guidelines

DEA Diversion Web Site

- www.deadiversion.usdoj.gov



DEA Diversion
431 Howard St.
Detroit, MI 48226
313-234-4377
313-234-4388

www.dea.gov

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